

Power of Vision

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May 27, 2009

Mr. Mike Monasmith
Siting Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Carlsbad Energy Center Project (07-AFC-6)
POV Data Request #1

DOCKET
07-AFC-6

DATE MAY 27 2009

RECD. JUN 02 2009

Dear Mr. Monasmith,

We have reviewed two documents submitted on behalf of the applicant, one a letter to you dated January 26, 2009 from Stoel Rives with its accompanying "Center for Biological Diversity Data Responses" dated January 2009 prepared by CH2MHILL (which documents somehow seemed to escape the docketing procedure), the other a (docketed) letter dated April 20, 2009 from Stoel Rives with an accompanying report from Sierra Research entitled, "2007 - 2008 Fuel Use and NOx Emission Information", also dated April 20, 2009.

In the "Center for Biological Diversity Data Responses", Table DRC3-1 indicates that the operating hours/yr for the five Encina Power Station Units as:

	Unit	hrs/yr
2007		
	1	1,328
	2	891
	3	1,753
	4	2,773
	5	3,483
2008		
	1	301
	2	886
	3	1,765
	4	3,902
	5	6,627

However, the applicant submitted higher operating hours/year to the San Diego Air Pollution Control District (SDAPCD) in their Rule 69 Compliance Reports for years 2007 and 2008, as follows:

	Unit	hrs/yr
2007		
	1	1,476
	2	997
	3	1,795
	4	2,918
	5	3,546

2008	
1	373
2	982
3	1,891
4	4,093
5	6,749

The discrepancy between these two sets of figures is unexplained.

Furthermore, in parsing through the Sierra Research report entitled, “2007 - -2008 Fuel Use and NOx Emission Information”, we find that the days of operation/yr are (to the best of our knowledge):

Unit	days/yr
2007	
1	63
2	42
3	85
4	132
5	166
2008	
1	11
2	39
3	84
4	182
5	287

Note that from the kwhrs produced, as indicated in this report, one can deduce that on many of the days, the units operated only briefly, not the full 24 hours. Nevertheless, by dividing the operating hours/yr given by the “Center for Biological Diversity Data Responses”, Table DRC3-1 or the operating hours/year reported by NRG to the San Diego Air Pollution Control District (SDAPCD) in their Rule 69 Compliance Reports by the days of operation derived from the Sierra Research report entitled, “2007 - -2008 Fuel Use and NOx Emission Information”, we discover a number of cases where the units would have had to (miraculously?) operated more than twenty four hours a day. For example if we divide the 373 hours/yr that Unit 1 operated in year 2008 (according to the Rule 69 Compliance Report) by the 11 days/yr, we get that this unit had to operate 33.9 hrs/day! For the other units and year of operation, the operating hours/day calculations range from 21 to 25.2 hours per day.

Because of the anomalies indicated above in the applicant’s reported data, and in order to determine whether other data reported by the applicant as far back as the year 2002, including that reported for emissions, are accurate, Power of Vision (POV) hereby requests that the original documents wherein the applicant records hourly data on Encina Power Station units 1 – 5 relating to times of operation, fuel consumption, and NOx emissions be made available for inspection and possible copying by POV and other parties to this application. Since such original records may be voluminous, we suggest such inspection be made at the plant site where the records originated.

Sincerely yours,

Arnold Roe, Ph.D\
Power of Vision

**BEFORE THE ENERGY RESOURCES
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**APPLICATION FOR CERTIFICATION
Docket No. 07-AFC-6
FOR THE CARLSBAD ENERGY Center Project
PROOF OF SERVICE
(Revised 5/11/2009)**

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DECLARATION OF SERVICE

I, Julie Baker, declare that on June 1, 2009 , I deposited copies of the attached Power of Vision Request for Data in the United States mail at Carlsbad, CA with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

And

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.

Julie Baker

June 1, 2009